



Respectfully submitted,

BY: /s/ Timothy M. Dortch

**TIMOTHY MICAH DORTCH**

State Bar No. 24044981

micah.dortch@cooperscully.com

**R. BRENT COOPER**

State Bar No. 04783250

brent.cooper@cooperscully.com

**LAUREN TOW**

State Bar No. 24081179

lauren.tow@cooperscully.com

**COOPER & SCULLY, P.C.**

Founders Square

900 Jackson Street, Suite 100

Dallas, Texas 75202

Tel.: 214/712-9501

Fax: 214/712-9540

**COUNSEL FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of Appendix to Defendants' Response to Plaintiff's Emergency Motion to Extend Trial Date and Scheduling Order Deadlines to all counsel of record for all parties via ECF on the 23<sup>rd</sup> day of October, 2015.

/s/ Timothy M. Dortch

**TIMOTHY MICAH DORTCH**

# **EXHIBIT “A”**

**Tow, Lauren**

---

**From:** Tow, Lauren  
**Sent:** Wednesday, October 07, 2015 2:30 PM  
**To:** 'Maria Arakelian'  
**Cc:** Dortch, Micah; Eugene Rome; [dpsartnetlaw@gmail.com](mailto:dpsartnetlaw@gmail.com); Jerl Leutz; [jbbartnetlaw@gmail.com](mailto:jbbartnetlaw@gmail.com)  
**Subject:** RE: Chilly Dil v. Jetpay - Correspondence re Documents

Mr. Rome,

As you are aware, we timely served objections to you for this request prior to the deposition of Mr. Fuller. That being said, at this time I have not received the documents, nor have I had an opportunity to evaluate whether or not I will agree to waive the objections. We are in discussions with Mr. Fuller on this matter. I will be out of town from October 8-14, 2015, some of which I will be out of the country. I will try to get a response to you by the end of next week when I am back in town.

Lauren Tow

**From:** Maria Arakelian [<mailto:MAarakelian@romeandassociates.com>]  
**Sent:** Tuesday, October 06, 2015 6:40 PM  
**To:** Tow, Lauren  
**Cc:** Dortch, Micah; Eugene Rome; [dpsartnetlaw@gmail.com](mailto:dpsartnetlaw@gmail.com); Jerl Leutz; [jbbartnetlaw@gmail.com](mailto:jbbartnetlaw@gmail.com)  
**Subject:** Chilly Dil v. Jetpay - Correspondence re Documents

Dear Ms. Tow:

Please see the attached correspondence.

Sincerely,

Maria Arakelian  
Paralegal  
Rome & Associates, A.P.C.  
2029 Century Park East, Suite 1040  
Los Angeles, CA 90067  
Telephone: (310) 282-0690  
Facsimile: (310) 282-0691  
[marakelian@romeandassociates.com](mailto:marakelian@romeandassociates.com)  
[www.romeandassociates.com](http://www.romeandassociates.com)

**CONFIDENTIAL COMMUNICATION:**

The information contained in this e-mail message is legally privileged and confidential information intended only for the use of the individual or entity named above. If the receiver of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this email message is strictly prohibited and may violate the legal rights of others. If you have received this message in error, please immediately notify the sender by reply email or telephone and delete it from your system.

**Tow, Lauren**

---

**From:** Eugene Rome <erome@romeandassociates.com>  
**Sent:** Thursday, October 08, 2015 12:15 PM  
**To:** Tow, Lauren; Maria Arakelian  
**Cc:** Dortch, Micah; dpsartnetlaw@gmail.com; Jerl Leutz; jbbartnetlaw@gmail.com  
**Subject:** RE: Chilly Dil v. Jetpay - Correspondence re Documents

Dear Ms. Tow,

We can wait until your return. We hope by that time you will have had a chance to review Todd Fuller's documents reflecting the referral fees and reassess our request for a production of same.

Very truly yours,

Eugene

ERome@RomeAndAssociates.com  
Rome & Associates, A.P.C.  
2029 Century Park East, Suite 1040  
Los Angeles, CA 90067  
Telephone: (310) 282-0690  
Facsimile: (310) 282-0691

~~ www.romeandassociates.com ~~

CONFIDENTIAL COMMUNICATION.

The information contained in this e-mail message is legally privileged and confidential information intended only for the use of the individual or entity named above. If the receiver of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this email message is strictly prohibited and may violate the legal rights of others. If you have received this message in error, please immediately notify the sender by reply email or telephone and delete it from your system.

**From:** Tow, Lauren [<mailto:Lauren.Tow@cooperscully.com>]  
**Sent:** Wednesday, October 07, 2015 12:30 PM  
**To:** Maria Arakelian  
**Cc:** Dortch, Micah; Eugene Rome; [dpsartnetlaw@gmail.com](mailto:dpsartnetlaw@gmail.com); Jerl Leutz; [jbbartnetlaw@gmail.com](mailto:jbbartnetlaw@gmail.com)  
**Subject:** RE: Chilly Dil v. Jetpay - Correspondence re Documents

Mr. Rome,

As you are aware, we timely served objections to you for this request prior to the deposition of Mr. Fuller. That being said, at this time I have not received the documents, nor have I had an opportunity to evaluate whether or not I will agree to waive the objections. We are in discussions with Mr. Fuller on this matter. I will be out of town from October 8-14, 2015, some of which I will be out of the country. I will try to get a response to you by the end of next week when I am back in town.